

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

<b>IN RE GENETICALLY MODIFIED RICE LITIGATION</b>	) ) ) ) )	<b>4:06 MD 1811 CDP  ALL CASES</b>
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**PLAINTIFFS' OBJECTIONS TO  
MARK HALSEY DEPOSITION DESIGNATIONS**

CITE	OBJECTION	COUNTERDESIGNATION
9:23 – 10:4		
10:8-14		
10:23 – 11:19		
12:8-19		
37:14 – 40:16		
		59:1–9
		59:12 – 61:5
		61:8-14, 17–19
		61:21 – 62:2
		62:5 – 63:1
68:23 – 70:12		
70:15 – 74:4		
74:7-18		
74:21 – 75:2		
75:5–16; 75:19 – 76:12; 76:15 – 77:8; 77:11 – 77:23; 78:1 -21	Object to relevance. The Question and Answer address containment, defined by Dr. Halsey as being within a physical structure and does not apply to field trials.	
89:23 – 92:8		
98:14 – 99:4		
		95:13–24
		100:1–13; 102:14-20; 102:23 – 103:8
		95:3–24
		96:3 – 97:2
		97:5 – 98:13

		114:15 – 116:12
		133:2-11; 134:2-9
		141:9-12, 15-8
		141:21 – 142:7
		142:16-18
		142:21 – 143:12
		144:20 – 145:9
		145:12 – 146:11
146:17-20		
146:23 – 147:1		
147:13-22		
148:1-6		
148:9-11		
		148:12-14
		148:17-20
148:21 – 149:1		
149:4-10		
149:13 - 17		
		151:1-3
		151:6-24
		152:3-17
		152:19 – 153:11
155:9-13		
155:16-21		
	Add conclusion in report that Bayer did not achieve the standard.	155:18-24
155:24		
		156:12 – 157:5
		158:2 – 160:18
		165:4 – 167:9
		169:24 – 170:7
		170:16 – 174:2
		174:5 – 175:9
		175:12 – 176:17
		176:20 – 179:11
184:10-15		
		184:16-19
		184:22 – 185:14
187:14-19	object to relevance	
188:2-19		
188:24 – 189:21	Object to this line of questioning. Whether irrational is irrelevant.	

189:24 – 190:11		
190:14 – 191:13	Object to relevance	
191:16–21		
191:24		
		192:1-14
		192:17 – 194:3
195:6 – 197:2		
		210:9–15
		210:18 – 211:3
		226:6–22
		227:1–14
		227:17 – 228:5
		235:4 – 236:17
		250:6 – 251:10
		251:22 – 252:4
		252:9–19
		252:24 – 253:14
		254:3-6
		254:9-23
		255:6 – 256:21
		265:23 – 267:8
		294:5-9
		294:12 – 295:17
295:18–21		
295:24 – 296:7		
296:10–15		
296:18–24		
297:3-4		
		299:18 – 300:1
		300:4-15

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that I have this 23<sup>rd</sup> day of October, 2009, electronically filed a copy of the foregoing with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the parties of record.

/s/ Don M. Downing